To: Cozad, David[Cozad.David@epa.gov]

From: Stoy, Alyse

Sent: Fri 10/16/2015 8:48:27 PM **Subject:** Fwd: Sperling deposition

Dr Tony Sperling - ROUGH DRAFT 10-14-15 REDACTED.pdf

ATT00001.htm

Dr Tony Sperling - ROUGH DRAFT 10-15-15.pdf

ATT00002.htm

Sent from my iPhone

Begin forwarded message:

From: "Cunningham, Ally (LG)" < <u>ACunningham@LATHROPGAGE.COM</u>>
To: "Beck, Bill (LG)" < <u>WBeck@LATHROPGAGE.COM</u>>, "Stoy, Alyse"
< <u>Stoy.Alyse@epa.gov</u>>

Cc: "Merrigan, Jessie (LG)" < <u>JMerrigan@LATHROPGAGE.COM</u>>

Subject: RE: Sperling deposition

Alyse -

The rough draft of the transcript is attached. The snip that Bill provided below appears on page 186 of the day two (10-15-15) rough transcript. Please let me know if you have any questions or if we can provide any additional information.

Thanks, Ally

Ally Cunningham
Associate
Lathrop & Gage LLP
2345 Grand Blvd., Suite 2200 | Kansas City, MO 64108-2618
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Please consider the environment before printing this email.

-----Original Message-----

From: Beck, Bill

Sent: Friday, October 16, 2015 10:41 AM

To: Stoy, Alyse

Cc: Merrigan, Jessie; Cunningham, Ally

Subject: Re: Sperling deposition

Alyse,

Ally is arranging to get you the rough draft.

There need to be a couple of minor redactions made about protective orders and a confidentiality agreement, but it will come pretty soon.

Regards, Bill

On Oct 16, 2015, at 4:06 AM, Stoy, Alyse <<u>Stoy.Alyse@epa.gov</u>> wrote:

Thank you Bill. If the draft transcripts are available that would be great.

Alyse

Sent from my iPhone

On Oct 15, 2015, at 11:15 PM, Beck, Bill (LG) < <u>WBeck@LATHROPGAGE.COM</u>> wrote:

Alyse, please see below a brief excerpt from the court reporter's rough draft of my deposition today of Attorney General Koster's technical expert Tony Sperling.

Please let me know if you would like to see the rough draft of the entire two-day deposition transcript.

Regards, Bill

Lead AGO expert witness Tony Sperling:

- The first thing is this: What is
- 21 happening at the Bridgeton Landfill today
- as we talked is not a fire, right?
- 23 A Correct.
- 24 Q It is a subsurface reaction that happens

25		to be both self-sustaining and exothermic,
		186
1		meaning it gives off heat?
2	A	Yes, sir.
3	Q	Today, that reaction is confined to the
4		South Quarry of Bridgeton Landfill,
5		correct?
6	A	Yes, correct.
7	Q	It's not in the North Quarry, correct?
8	A	Correct.
9	Q	And it's not close to the radiologic
10		material at OU-1?
11	A	Correct.
12	Q	It is not moving in that direction in any
13		way that you can discern?
14	A	On that one, I would say I have not
15		examined the information at the neck in
16		the level of detail to determine if there
17		is movement.
18	Q	Okay.
19	A	If there is movement, it's relatively much
20		slower than it has been in the past.
21	Q	And if there is movement, you don't know

- it as you sit here today?
- 23 A Correct.
- 24 Q And from the standpoint of the reaction
- 25 front as that term is technically used,

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- 1 it is in the opposite direction from the
- 2 neck?
- 3 A Correct.

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